

DETENTION AFFIDAVIT OF BOSTON POLICE DETECTIVE GREGORY BROWN

I, Gregory Brown, being duly sworn, depose and state as follows:

I. Introduction

1. I submit this affidavit in support of the government's motion that the following individuals be detained pending trial or in support of the government's request for conditions of pretrial release for: **KENJI DRAYTON, a/k/a "Bigs;" WINSTON MCGHEE, a/k/a "Pooh;" HASSAN MONROE, a/k/a "Snack;" DEREK HART, a/k/a "Bro;" ERIC DAVIS, a/k/a "Bags;" MAURICE COATES, a/k/a "Mo;" DERRICK HOBSON; ANDRE ECHEVARRIA; ANTONE JEREMIAH; MICHAEL STOKES; MICHAEL TOUSSAINT; KAREEM CHAPLIN; TATIANA MORRISSEY; RUSSELL HANKERSON; JARMINA KALLON; RENARDO WILLIAMS; TARIK MUHAMMAD; MATTHEW DRAYTON, a/k/a "Ma", a/k/a "Teddy Bear;" ARTHUR HODGES, a/k/a "Ike," a/k/a "Ikey;" JEAN AMAN, a/k/a "Hood," a/k/a "Haitian;" NELSON HERNANDEZ, a/k/a "Sito;" TERRENCE DAYE; KEITH DAYE; PHILLIP WILLIAMS ("the Targets").** The targets have been charged with conspiracy to distribute and possess with intent to distribute cocaine and cocaine base in violation of 21 U.S.C. § 846 in criminal complaints. *United States v. Kenji Drayton, et al.*, Case No. 20-2431-MBB (the "K. DRAYTON Compl."); *United States v. Matthew Drayton, et al.*, Case No. 20-2430-MBB (the M. DRAYTON Compl.). The Targets are also alleged to be members or associates of the Fidelis Way street gang, Wainwright Street gang, and other gangs operating in the city of Boston. The Targets distributed cocaine and cocaine base, a/k/a "crack cocaine" in and around the Fidelis Way Housing Development as well as other sections of the city including Dorchester, Roxbury and Mattapan.

2. I am a Detective with the Boston Police Department ("BPD") where I have worked for 32 years. I am currently assigned to BPD's Special Investigation Unit ("SIU"), where I have

worked for thirteen years.¹ SIU is a city-wide unit made up of Detectives and other investigators who regularly work with units throughout BPD and with federal investigative agencies such as the Drug Enforcement Administration (“DEA”) investigating drug, firearms and other crimes being committed by street gangs and other criminal organizations operating in and around the city of Boston.

3. I have received training in enforcement and investigation of firearm and narcotics cases. I have also received training in the investigation of organized street gangs involved in firearms trafficking and narcotics distribution. I have conducted and participated in investigations involving the violation of both the federal drug and firearms laws, including 18 U.S.C. § 922(g)(1) --being a felon in possession of a firearm or ammunition, and 21 U.S.C. §§841 and 846 -- illegal distribution of narcotics and conspiracy to distribute narcotics.

II. Background of Investigation

4. This case involves an approximately 20-month investigation by the Drug Enforcement Administration, working with other state and local agencies, including the Boston Police Department (“BPD”), between approximately November 2018 and June 2020. That investigation, dubbed “Operation Snowfall,” focused on the drug-distribution activities of a drug-trafficking organization (“DTO”) that **Matthew DRAYTON** and **Arthur HODGES**, along with their co-conspirators, operated within the Boston area. The investigation also ultimately resulted

¹ Prior to my assignment to the Special Investigations Unit, I was an investigator in the Youth Violence Strike Force from 1995 to 2007 and I was assigned to the Anti- Gang Violence Unit from March 1993 to May 1995. My primary duties as an investigator in these units were to identify Boston based street gangs, document their membership and gather intelligence relative to gang activity. I also worked in partnerships with other law enforcement and community based agencies to initiate procedures to disrupt the organizational structure and reduce the criminal activities of these gangs.

in a broader investigation into one of **M. DRAYTON**'s co-conspirators, his brother **K. DRAYTON**, who ran a separate and complementary drug-trafficking conspiracy.

5. **M. DRAYTON** and **HODGES**, along with their co-conspirators, used locations in the Commonwealth Development in Brighton, Massachusetts ("Fidelis Way") in Brighton, Massachusetts, to distribute cocaine and cocaine base in Boston, Massachusetts. Fidelis Way is a multi-apartment public housing development whose residents range from multi-generation families to elderly individuals. The investigation showed that **M. DRAYTON**, **HODGES**, and their associates, through their drug-trafficking activities, assumed control over multiple Fidelis Way apartments, which they operated as "stash house" locations where they stored, cooked, packaged, and sold their drugs.

6. Over the course of this investigation, in total, federal agents and task force officers have purchased and seized approximately 1.7 kilograms of cocaine and cocaine base, approximately twenty-seven pounds of marijuana, about \$200,000 in cash, over 200 rounds of ammunition, and eleven firearms.

III. Commonwealth Development

A. Commonwealth Development at 35 Fidelis Way, Brighton, Massachusetts, a/k/a the Fidelis Way Housing Development

7. The Fidelis Way Housing Development, now known as the Commonwealth Development ("the Development" or "Fidelis Way"), is one such low-income housing option. The Development is located in the Brighton section of Boston, Massachusetts. The Fidelis Way Housing Project, as it was known, was built in 1951 as a 640 unit housing project, which suffered

high vacancy rates, excessive turnover rates, and rampant crime.² It was converted in the 1980's from strictly public housing to mixed-income housing and boasting of innovative strategies to improve the development, including density reduction and elimination of common stairs and entrances. The now 392 unit community includes a day care center, a senior center, a community garden, and a multi-purposed administration building. The Development offers housing for families as well as elderly and disabled individuals under the Boston Housing Authority. 2-8 Fidelis Way is a 116 unit building that specifically provides housing for elderly and disabled tenants, to include handicap accessible and equipped units. The Development is geographically situated at the corner of Commonwealth Avenue and Washington Street in Brighton, Massachusetts.



Fidelis Way Housing Development, Brighton, Massachusetts

8. The new improvements of the Development did not address the insular nature of its overall layout, which included one way in and one way out, making access difficult for law enforcement to patrol proactively or to conduct meaningful surveillance inside The Development.

² Tise Design Associates <https://www.tisedesign.com/commonwealth-development>

In turn, this has made the location appealing to the likes of **M. DRAYTON** and **HODGES**, both of whom are associated with the Fidelis Way street gang. **M. DRAYTON, HODGES** and members of the **M.DRAYTON-HODGES DTO** used the Development as a primary location to conduct their drug trafficking business. I am not aware of a large enforcement action at Fidelis Way, at least within the last twenty or so years. Despite several attempts to diminish the drug activity within the Development, including the BPD Drug Control Unit executing several search warrants at locations within Fidelis Way, on many of such occasions, drug dealers resume their activities the following day.

B. M.DRAYTON-HODGES DTO Activity within the Development

9. As a result of this investigation, I believe that the **M.DRAYTON-HODGES DTO** took over specific apartments within Fidelis Way for drug dealing and as a result assumed control over portions of the Development. The DTO took several kinds of actions in the Development: acquiring wholesale quantities of drugs; storing, processing, and packaging drugs for redistribution; distribution of wholesale quantities to other dealers; and selling personal use quantities to drug users and addicts. As discussed below, members of the DTO displaced other residents of the Development, engaged in violence and other criminal activity in the Development, invited other criminals into the Development, and actively promoted and encouraged drug use within the Development. As a result, their activities caused a blight of the Development and reduced the quality of life of the other residents.

10. A rap video titled “16 Bars of Hell”, published on YouTube in October 2017, shows **HODGES** and his associates inside of an apartment within the Fidelis Way Housing Development with a large amount of currency on the table. It appears parts of the video were taken outside in the hallway of the apartment building.

11. BPD has received citizen complaints about the drug activity in the Development. In December 2017, the BPD Drug Control Unit executed a state search warrant at an apartment in 2-4 Fidelis Way, a known drug location identified in this investigation. Officers recovered a crack pipe, spoon, copper filter, ripped clear plastic bags, all instrumentalities of crack use, and digital scales, which are consistent with drug use and dealing, and mail in the name of **Arthur HODGES**. One of the female occupants stated that she knew **HODGES** as "Ike" and that she had made complaints about him selling drugs out of her apartment in the past. The female occupant further stated that **HODGES** was at her apartment the night before and observed him hand a package she believed to be drugs to another male and heard **HODGES** tell that male "go to work". On another occasion, the same tenant again complained that her apartment had been taken over because the apartment was located in the rear of the building and had access to an outdoor patio, allowing dealers to meet drug customers for drug transactions.³ She also told officers that **HODGES** and others had taken over other apartments, whose occupants were drug customers, elderly and/or disabled, and were using these apartments to sell crack cocaine. According to the same source report, they forced the tenant to sleep in the closet while they sold drugs out of the there. Upon the victim moving out of the apartment in June 2019, the apartment, which should have been vacant at that time, was taken over by **Phillip WILLIAMS (P. WILLIAMS)** and his girlfriend, where they continued to sell drugs, without the knowledge of the Fidelis Way Housing Management.

12. During the course of the investigation, law enforcement made a series of controlled purchases and/or payments made for illegal narcotics by cooperating witnesses with **M. DRAYTON, HODGES** and/or **K. DRAYTON**, including several within Fidelis Way. Investigators intercepted numerous communications directing Target Subjects to go to Fidelis Way

³ I know the address of this apartment but omit it here out of a concern for safety.

to distribute narcotics. For example, on May 6, 2019, at approximately 6:24 p.m., **HODGES** called **T. DAYE** to coordinate re-supplying **HODGES** with cocaine. Based on surveillance reports, **T. DAYE** then traveled to 2-8 Fidelis Way to supply **HODGES**'s stash location in Apartment 241 with cocaine, which **T. DAYE** was to hand off to a drug runner, who was waiting for **T. DAYE**'s drug delivery.⁴ On May 15, 2019, at approximately 4:57 p.m., **HODGES** called **T. DAYE** to purchase cocaine from **T. DAYE** and instructed him to go to room 112 when he arrived at 2 Fidelis Way, Brighton, Massachusetts.⁵ And on May 24, 2019, there were a series of communications between **HODGES** and **P. WILLIAMS** and **HODGES** and **T. DAYE** regarding the supply of cocaine.⁶ On this date, **T. DAYE** was directed by **HODGES** to come up to the "sixth floor" of 34 Fidelis Way. It is believed **T. DAYE** was supplying **HODGES** with cocaine and in turn, shortly after, **HODGES** communicated to **P. WILLIAMS** he had a supply of cocaine, when he told **P. WILLIAMS** "Yo! He brought it, but I don't got no calculator there, but he said it was straight. **P. WILLIAMS** responded, "I got a calculator and everything with me...Where you at?" **HODGES** replied "I'm at Sito's". **P. WILLIAMS** responded, "Alright, I'll be right over there."

13. Members of the **M.DRAYTON-HODGES DTO** actively monitored police activity in the Development. For example, on July 2, 2019, at 8:01 p.m., immediately after an arrest for domestic assault by a female, who I believe was a drug runner for the DTO, against her fiancé, law enforcement intercepted a call between **K. DRAYTON** and **M. DRAYTON**, in which they discussed meeting for a drug transaction.⁷ During the call, **M. DRAYTON** said, "And I can't go to the bricks right now cause Nunez and them up there." **K. DRAYTON** again said, "Alright."

⁴ This call is described in ¶¶ 56-60 of the **M. Drayton** Complaint Affidavit

⁵ This call is described in the **M. DRAYTON** Complaint Affidavit at ¶ 65.

⁶ This call is described in the **M. DRAYTON** Complaint Affidavit at ¶¶ 70-76

⁷ This call is described in more detail in the **M. DRAYTON** Complaint Affidavit at ¶¶ 34-35.

M. DRAYTON explained, “That’s why I am just waiting.” **K. DRAYTON** responded, “Alright, well try to figure it out.” Based on this call and the investigation, I know that “bricks” is code within the **M. DRAYTON-HODGES DTO** for the Fidelis Way public housing complex and that “Nunez” is a reference to Boston Police Officer Jason Nunez, who made the arrest and was known to them as a longtime member of the local Boston Police Drug Control Unit.

14. I believe that **M. DRAYTON** actively sought to keep other dealers and suppliers out of the Development, in keeping with the DTO’s takeover of apartments within the Development. For example, on June 23, 2019, in a call intercepted by law enforcement, **M. DRAYTON** told **HODGES**, “The shit, this shit is getting crazy bro, nigga. I’m about to park nigga. I just bust Clock in the fucking head with a hammer bro”.⁸ Later in the same conversation, **M. DRAYTON** said “tell the niggas bro. Don’t get no shit from nowhere else bro cause I’m gonna start checking niggas twerk, niggas don’t got that shit, bro. That shit, shit, this shit gotta stop, man. I can’t, I’m over here cuffing twerk from other motherfuckers, these niggas is eating bro. Like nigga, this shit is not right nigga. Like, this shit is not right, man. You know what I’m saying? These niggas, this shit is out of bound, bro like, out of bounds man. An then this stupid nigga go over there all fucking night, go come to me with a hundred and something dollars, talking about how he is cuffing, he is cuffing. He is cuffing?” Based on the call, I believe that **M. DRAYTON** instructed **HODGES** to make sure that **HODGES** or his drug runners or distributors –who worked in the Development – were selling **M. DRAYTON**’s cocaine base instead of others’ product.

⁸ This call is described in the **M. DRAYTON** Complaint Affidavit at ¶¶ 37-40. I know the name of “Clock,” who is a drug runner for the **M.DRAYTON-HODGES DTO**, but omit it because he is not charged federally.

IV. The K. DRAYTON Cocaine Supplier and Distributor Connections

A. Background of the K. DRAYTON DTO

15. The investigation into **M. DRAYTON** led to his brother, **Kenji DRAYTON (K. DRAYTON)**, who connected large quantity sources of supply to other dealers and himself. As a result, the investigation expanded to larger drug suppliers and their associates, including **Derek HART (“HART”)**, **Hassan MONROE (“MONROE”)**, **Eric DAVIS (“DAVIS”)**, **Winston MCGHEE (“MCGHEE”)**, and **Maurice COATES (“COATES”)**. This side of the investigation revealed drug trafficking activities between **K. DRAYTON** and his associates, who were mostly aligned through gang affiliations and/or bonds created in jail. These relationships helped cultivate the drug and firearm activity that continued to expand with these targets.

16. By way of background, in the late 1990s, early 2000s, there was a gang called the 700 Block, which occupied from the 700 block to about the 400 block on Washington Street, in Dorchester. Around 2006–2007, the gang splintered into small offset groups, including Wainwright gang, Stockton St. Bloods, Codman Square/Millet St. gang, and others, which have remained aligned with each other. **MONROE**, **HART**, **DAVIS**, and **MCGHEE** are of the similar ages and remain affiliated with gangs that splintered from the original 700 Block. I believe that their affiliations with aligned gangs and their general familiarity through gang involvement further their drug dealing by encouraging trust and comfort among them. In other words, they often know the same people and same places, which makes it easier, for example, to set up meeting locations (and, because of their trust and comfort, allows them to use locations that otherwise might be too susceptible to a drug theft). Furthermore, their status within their respective gangs enhances their credibility and connections and allows them to do larger drug deals.

17. The investigation of the **K.DRAYTON DTO**, which actually occupied the larger part of this investigation, revealed extensive drug dealing by its members. It also captured evidence of members, such as **MCGHEE** and **DAVIS**, planning acts of violence or speaking about acts of violence that had already been committed. I do not believe that these acts of violence were specifically gang-related or part of ongoing gang disputes. Instead, I believe that the Targets engaged in or contemplated violence for other reasons, such as private feuds or in furtherance of drug trafficking.

B. Drug Trafficking Activity

18. As extensively detailed in the **K. DRAYTON** Complaint Affidavit, the Targets bought, sold, transferred, stored, cooked, packaged and otherwise dealt extensively in cocaine and cocaine base. Their activities continued even as the coronavirus pandemic gripped the Commonwealth and the nation. For example, in April 2020, I believe that **DAVIS** traveled to California to try to purchase kilograms of cocaine.⁹ And on May 26, 2020, I believe that a runner for **COATES** traveled across Boston, including Mattapan, Roxbury, and the South End, and ultimately to Rhode Island.¹⁰

C. Violence and Firearms within the DTO

19. In addition to the drug activities captured on the intercept, several Target Subjects have been intercepted discussing methods of acquiring firearms and firearm related assaults or

⁹ This call is discussed at ¶ 177 of the **K. DRAYTON** Complaint Affidavit

¹⁰ These calls and surveillance are discussed at ¶¶ 134-139 of the **K. DRAYTON** Compl. Aff.

violence. For example, on February 16, 2020, **CHAPLIN** and **H. MONROE** discussed the need for easy access to firearms:¹¹

CHAPLIN: “I want shit everywhere.”

H. MONROE: “That’s how I got it in my crib.”

CHAPLIN: “As soon as you come to the door, in the bin, under the bed, go to the next room and shut the door...boom...and then in a bag. Boom...but, I won’t argue...I want one in the fucking bathroom, so matter where niggas is at, niggas can come out like... ‘what’s good.’”

H. MONROE: “Exactly,”

CHAPLIN: “Nigga, you might be taking a shit. Nigga kicking the door in...what happens... you got to try to get out to the living room, get out to my room, to the room...Nah Nigga, this shit is everywhere.”

H. MONROE: “That nigga is tripping...this is the nigga that got a gun...a strap in Cambridge. Fucking fuck...I’m of that mind set.”

CHAPLIN: “We should have an extra one” and “bring it over to the ‘honeycomb.’”

Based on training and experience, I know that the term, “strap” means a firearm. I believe that **CHAPLIN** and **H. MONROE** were discussing the importance of having a gun or guns readily available and easily accessible at multiple locations within their respective domain(s) to protect themselves.

20. As another example, on February 22, 2020, **H. MONROE** and **MCGHEE** were intercepted discussing how to acquire Suboxone strips (“S-B”) for people who are currently incarcerated. In the same conversation, **MCGHEE** spoke about someone having “joints” – which I know to be firearms – for sale. **H. MONROE** commented that they were too expensive at \$1,000

¹¹ This call is discussed at ¶¶ 56-57 of the K.DRAYTON Compl. Aff.

(“He wanted like a band”). **MCGHEE** later said that he pulled (“slid”) a .38 caliber revolver (“trey pound”) on someone and that, although he did not like revolvers, **MCGHEE** pulled a firearm on “Last Days”.¹² **MCGHEE** stated that Last Days and **MCGHEE** got into a verbal altercation in Boston by the W Hotel, and **MCGHEE** pulled a firearm on Last Days, who had an “AP,” which I believe is code for armor piercing bullets.

21. As another example, on September 20, 2019, at 4:20, **DAVIS** and **H. MONROE** were intercepted plotting a possible shooting. Based on this conversation, **DAVIS** and **H. MONROE** appeared to be looking for someone that **H. MONROE** observed in a barbershop (“He was in the chair.”), which investigators identified in Dorchester. At 4:37 p.m., **H. MONROE** received a call from **DAVIS**, where **DAVIS** said he was “[t]ucked in.” Based on this conversation, agents believed that **DAVIS** was hiding (i.e., “tucked in.”) and waiting for the unknown target of the violence to come back. Surveillance units and marked Boston Police cars were immediately deployed into the area to deter **DAVIS** or **H. MONROE** from acting, while officers attempted to identify the target. Investigators also searched for **H. MONROE** and **DAVIS**, but were unable to locate them because they appeared to be hiding as they waited to commit an act of violence (as described in the conversation above). In the end, it appeared that the intended target had left the area of the barbershop before **DAVIS** was able to find him.

22. On April 17, 2020, J.G., an associate of **MCGHEE**, was arrested for his involvement in a shots fired incident that occurred on Cheney Street in Boston, Massachusetts. On April 18, 2020, a photograph of a second male suspect was circulated among law enforcement, and officers assigned to this investigation identified the person as **MCGHEE**. On April 23, 2020,

¹² I believe that I know the identity of Last Days, who I believe is a member of the Bowdoin Street Dirty Hawks Gang in Boston.

MCGHEE was intercepted telling an unidentified male “my ‘blick’ on my hip nigga but I ain’t taking, I don’t take my ‘blick’ off my hip, be naked....well, I can’t give you my ‘blick’ bro, I be in shootings all the time.” Based on my training and experience, I know that “blick” means a gun. On April 27, 2020, Massachusetts District Court issued an arrest warrant for **MCGHEE** for his involvement in the shooting. Officers assigned to this investigation located **MCGHEE**. When they approached him, he ran, discarding a backpack and a firearm. Officers arrested **MCGHEE** a short distance away and recovered the backpack (which contained marijuana) as well as the firearm. A search of **MCGHEE** revealed that he was also in possession of small amounts of cocaine and marijuana.

V. The Federal Targets of Snowfall

23. The following sets forth the Targets charged in Case No. 20-2430-MMB and/or Case No. 20-2431-MMB with conspiring to distribute and possess with intent to distribute cocaine and cocaine base, in violation of 21 U.S.C. § 846. Specifically, the below summarizes each Target’s role in the investigation, including their believed gang association or history, drug distribution activity, suspected association with firearms (including use, trafficking, or possession), and their criminal history.

A. KENJI DRAYTON, A/K/A “BIGS”

24. I believe that **KENJI DRATYON** (“**K. DRAYTON**”) is a high level associate of the Fidelis Way gang and the younger brother and drug business partner of **M. DRAYTON**. Based on the investigation, I believe that **K. DRAYTON** is a source of supply (“SOS”) of cocaine and cocaine base in Boston and its surrounding communities.

25. **K. DRAYTON**'s criminal history includes a first-degree murder charge and unlawful firearm possession arising from a 2001 drug-distribution investigation involving the takeover of a "trap house" (i.e., a location in which narcotics are stored, sold, or prepared for distribution). In 2005, **K. DRAYTON** was convicted of the first degree murder charge and of unlawfully possessing a firearm. Ultimately, **K. DRAYTON** appealed his conviction and was granted a new trial, which resulted in his prior conviction being reduced to manslaughter.¹³ On July 19, 2017, **K. DRAYTON** was released from prison.

26. **K. DRAYTON**'s criminal history also includes convictions in 2000 for Drugs within 1000 feet of a Park or Playground, Possession to Distribute Class B, Possession of Class B, and Assault and Battery on a Police Officer. Based on my review of reports relating to the 2000 convictions, I know that the arrest for these offenses occurred at 35 Fidelis Way. At the time, Fidelis Way's Management had identified **K. DRAYTON** as a "No Trespass."

B. MATTHEW DRAYTON, A/K/A "MAN," A/K/A "TEDDY BEAR"

27. I believe that **MATTHEW DRAYTON** ("**M. DRAYTON**") is a high level associate of the Fidelis Way gang and a cocaine and cocaine base SOS in Boston and its surrounding communities.

28. From my work on this investigation, I know that **M. DRAYTON** distributes cocaine base from his residence in Roxbury, Massachusetts. Additionally, I believe that **M. DRAYTON**, along with co-conspirator and associate **HODGES**, use apartments within Fidelis Way to distribute cocaine base. Further, I believe that **M. DRAYTON** and **K. DRAYTON**

¹³ Commonwealth v. Kenji Drayton 479 Mass. 479; SJC-10667 01 Appellant Commonwealth 2017 Redacted Brief; SJC-10667 10 Appellee Drayton 2017 Brief

maintain a “stash house” at 18 Larchmont Street in Dorchester, Massachusetts where they store bulk quantities of cocaine and crack cocaine for resale. I also believe that **M. DRAYTON** and **K. DRAYTON** have stored drug proceeds and firearms at their sister’s residence, in Dorchester, Massachusetts.

29. **M. DRAYTON**’s extensive criminal history includes multiple drug-related convictions. Specifically, in 2008, **M. DRAYTON** was convicted of Possession to Distribute Class B, as well as Operating Recklessly and Resisting Arrest. In 2007, he was convicted of Distribution/Dispense Class B (Crack Cocaine) and Possession of Class D (Marijuana). **M. DRAYTON** also has a 2000 conviction for Distribution/Dispense Class B (Crack Cocaine) and Possession of Class D (Marijuana). **M. DRAYTON** also has a 2004 Continuance Without a Finding (“CWO”) for Firearm ID Card. Lastly, although it did not result in a conviction, I know that **M. DRAYTON** was shot in 2013 as he sat outside Fidelis Way in Brighton, which investigators believed to have been a drug-related incident.

C. ARTHUR HODGES, A/K/A “IKE,” A/K/A “IKEY”

30. I believe that **ARTHUR HODGES (“HODGES”)** is a member of the Fidelis Way street gang, and also, a member and distributor within the **M. DRAYTON-HODGES DTO**. Based on the investigation, I believe that **HODGES**, alongside **M. DRAYTON**, controls and oversees drug distribution activity within Fidelis Way. I know that in March and April 2019, **HODGES** participated in multiple controlled sales of cocaine base, all of which occurred in Fidelis Way.

31. **HODGES** has an extensive criminal history. He currently is on pre-trial release from Brighton District Court on pending drug-distribution charges. On September 26, 2018, **HODGES** was charged with Distribution/Dispense Class B (Crack Cocaine). The facts of that

case involved a drug deal between two individuals at Fidelis Way, one of whom subsequently admitted to law enforcement officers that he purchased three bags of crack cocaine from **HODGES**. **HODGES** was subsequently arrested for his participation in the deal.

32. Additionally, **HODGES** has a 2013 conviction for Trespassing and Assault and Battery on a Police Officer, a 2009 conviction for Possession to Distribute Class D (Marijuana), a 2007 conviction for Possession to Distribute Class D (Marijuana), and 2006 convictions for Assault and Battery with Injury, Witness Intimidation, and Distribution of Class B (Cocaine/Cocaine Base). **HODGES** also has a 2018 CWO for Possession of Class B (Cocaine), a 2014 CWO for Operating Negligently and Carrying a Dangerous Weapon.

D. JEAN AMAN, A/K/A “UM3920,” A/K/A “HOOD,” A/K/A “HAITIAN”

33. **JEAN AMAN** (“**AMAN**”) is a drug supplier for **M. DRAYTON**. As noted in Complaint 20-MJ-2430-MBB (incorporated herein), investigators arrested **AMAN** in August 2019 after intercepting communications between **AMAN** and **M. DRAYTON** that indicated **AMAN** was going to supply **M. DRAYTON** with cocaine. Law enforcement officers subsequently stopped **AMAN** as he was believed to be en route to meeting with **M. DRAYTON**. During that stop, officers recovered approximately 62 grams of cocaine from his person. Officers also subsequently executed a search warrant at **AMAN**’s residence at Apartment 14, 39 Peterborough Street, Boston, Massachusetts. During the search warrant’s execution, officers recovered approximately 600 grams of cocaine, \$195,731, three firearm magazines, paperwork in **AMAN**’s name, and 167 rounds of assorted firearms ammunition.



08-20-2019 – 39 Peterborough Street #14 Search Warrant

34. **AMAN** currently is on pre-trial release out of Roxbury District Court for pending state charges for Trafficking Class B (Cocaine) arising from the above-referenced August 2019 arrest. **AMAN** also has a 2017 Possession to Distribute Class B (Cocaine) conviction.

35. **AMAN** has a criminal history that includes several firearm and drug related charges. Specifically, **AMAN** has a 2011 conviction for Possession of a Firearm, Distributing a Controlled Substance (Cocaine), and Resisting Arrest, for which he was sentenced to 21 months' imprisonment. According to police reports for that case, police approached **AMAN** and another individual for questioning after they were observed exiting **AMAN's** car carrying boxes of fireworks. **AMAN** identified the car as his. When officers asked for the keys to the vehicle to conduct a search, **AMAN** fled. Officers ultimately succeeded in apprehending **AMAN** after prior attempts resulted in **AMAN** sprinting off. During a search of the car, officers found a clear plastic bag containing about 16 individually-wrapped plastic bags of suspected crack cocaine. Officers

also found a .357 Ruger firearm with an obliterated serial number. The firearm – found in the glove compartment – was fully loaded with six .38 caliber rounds.

E. NELSIN HERNANDEZ, A/K/A “SITO”

36. I believe that **NELSIN HERNANDEZ** (“**HERNANDEZ**”) is a street level cocaine base distributor for **HODGES**. Throughout the investigation, agents intercepted numerous phone calls between **HERNANDEZ** and **HODGES** in which they discussed drug distribution, drug sales, and drug supply. **HERNANDEZ**’s criminal record includes a 2011 CWO for Resisting Arrest.

F. TERRENCE DAYE, A/K/A “T”

37. **TERRENCE DAYE** (“**T. DAYE**”) is a cocaine SOS for **HODGES** who supplies cocaine and cocaine base to **HODGES**.

38. I know that **T. DAYE** has a 2019 CWO for Operating Under the Influence of Alcohol and a 2009 CWO for Assault and Battery. **T. DAYE**’s criminal history also includes convictions in 2013 for Possession of a Firearm Without a Permit, Carrying a Firearm with Ammunition, and Resisting Arrest. At the time of his arrest, officers found a Jennings J-22 handgun in **T. DAYE**’s pants pocket, which contained four rounds of ammunition – three rounds in the magazine and one in the chamber.

G. KEITH DAYE

39. I believe that **KEITH DAYE** (“**K. DAYE**”) is a cocaine SOS for **T. DAYE**, who – as noted above – supplies drugs to other wholesale distributors, including **HODGES**. During the investigation, investigators arrested one of **K. DAYE**’s wholesale quantity customers who was

then in possession of 125 grams of cocaine. Investigators had surveilled the customer meeting with **K. DAYE** in a suspected drug deal shortly before his arrest.

40. **K. DAYE's** criminal history includes a 2001 conviction for Possession of a Firearm, Possession of a Firearm, and Discharging a Firearm Within 500 Feet of a Dwelling. Other convictions include a 2004 conviction for Bribery and Conspiracy; a 2000 conviction for Assault and Battery; a 1999 conviction for Assault and Battery; a 1994 Conviction for Manufacturing Class B and Possession of Class B; a 1993 conviction for Conspiracy to Violate Controlled Substance Act and Controlled Substance in a School Zone; and a 1998 CWO for Disorderly Conduct.

H. MAURICE COATES, A/K/A "MO"

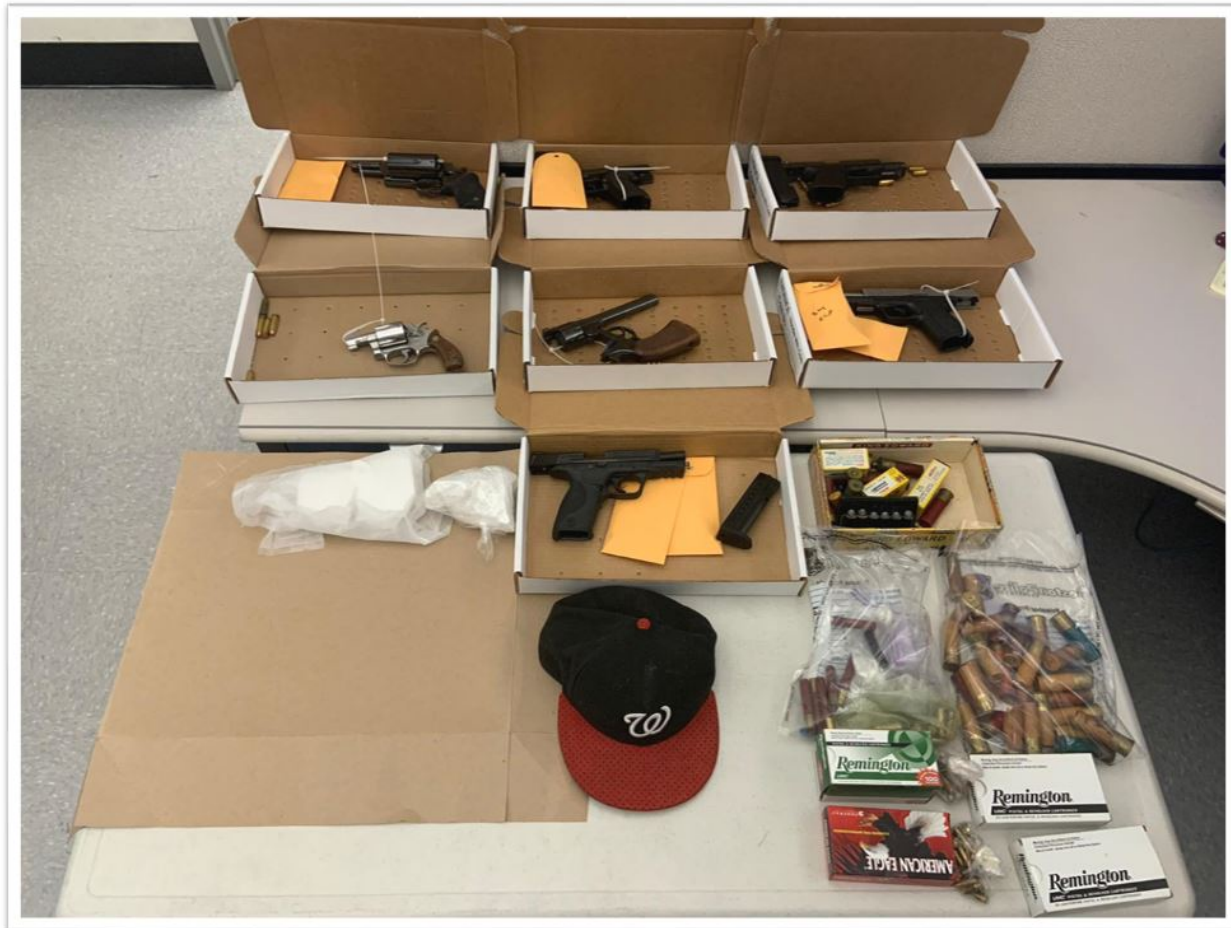
41. I believe that **MAURICE COATES ("COATES")** is a member of the Fidelis Way Street Gang and a member of the **K. DRAYTON DTO**. In addition to **COATES's** drug distribution activity within the **K. DRAYTON DTO**, I also believe that **COATES** arranged for **K. DRAYTON** to obtain a firearm on April 28, 2020, which law enforcement subsequently seized. Specifically, on intercepted calls, **COATES** told **K. DRAYTON** to call the number he had given him ("I sent you the digits that you need to go through") and to speak with a female who would "accommodate" him. **COATES** instructed **K. DRAYTON** to tell the female that he needed "the thing they left over there . . . I need to come grab that." That same day, investigators intercepted calls between **K. DRAYTON** and a female who told **K. DRAYTON** that her "boyfriend is gonna give it to you, just I'll call him when you're outside" and "he cleaned it and everything," which I believe to be a reference to the firearm.

42. **COATES** has an extensive criminal history. **COATES** has a 2017 conviction for Destruction of Property and Resisting Arrest and a 2014 conviction for Disorderly Conduct and Resisting Arrest. **COATES** also has a 2008 conviction for Distribute/Dispense Class B (Cocaine)

and Carrying a Firearm Without a License While Intoxicated (for which he was sentenced to about five years' imprisonment). Also in 2008, **COATES** was found guilty of Assault to Rob and sentenced to two-and-a-half to three years' imprisonment. In 2003, **COATES** was convicted of Possessing Firearm and Possessing Ammunition, for which he received a four-to-five year sentence (to run concurrently). **COATES** also has a 2002 conviction for Disorderly Conduct and Assault Dangerous Weapon, for which he received a six month sentence on the former and a four-to-five year sentence on the latter (to run concurrently). Additional convictions include Trespassing (1998), True Name Violation, Attaching Wrong Motor Vehicle Plates, Compulsory Insurance Violations, and Operating After Suspended License (1998), Assault and Battery with a Dangerous Weapon (sentenced to two-to-three years' imprisonment), Assault and Battery and Knowingly Receiving Stolen Property (1996), and Possession of a Controlled Substance with Intent to Distribute (1996).

I. HASSAN MONROE, A/K/A "SNACKS"

43. I believe that **HASSAN MONROE** ("**MONROE**") distributed large quantities of cocaine and cocaine base to **K. DRAYTON** and others within the **K. DRAYTON DTO**. Additionally, based on intercepted communications, I believe that **Kareem CHAPLIN** and **MONROE** shared a "stash house" located at 55 Woodhaven Street. On February 28, 2020, investigators executed search warrants at both the stash house and on **MONROE's** black Audi A8 with Massachusetts registration 5YCD20. During the search warrant's execution at 55 Woodhaven Street, investigators seized six handguns, approximately 417 grams of cocaine, large amounts of ammunition, and paperwork in **CHAPLIN's** name. Inside **MONROE's** car, investigators found a loaded handgun and approximately 250 grams of cocaine, as well as paperwork in **MONROE's** name. Next to the loaded handgun was a box of rubber gloves.



02-28-2020 – 55 Woodhaven Street Search Warrant

44. Additionally, I believe that **MONROE** is a member of the Wainwright Street, a/k/a Park Lyfe Street Gang. During the February 2020 search of **MONROE**'s Audi, investigators seized a Washington Nationals' "W" hat. From my training and experience, I know that the Nationals' "W" symbol is commonly used to represent the Wainwright Street gang. Furthermore, I know that **MONROE** has been featured in rap videos on YouTube, including one titled, "Brotherskeeper – Valentino Fame x Pudge x Trap Feeva,"¹⁴ that was published March 30, 2020. **MONROE** is visible in the rap video along with other suspected Wainwright gang members. The

¹⁴ BrothersKeeper - Valentino Fame x Pudge x Trap Feeva – YouTube, published March 30, 2020

<https://www.youtube.com/watch?v=n4nzxwLczGQ&feature=youtu.be>

rap video also features the Washington Nationals hat's "W" insignia. At the 2:39 minute mark, one of the rappers points to **MONROE**, calls him by his street name ("Snacks"), and raps, "he knows he got it" (which I believe to be a reference to **MONROE**'s drug supply).

45. **MONROE** is also featured in a second rap video on YouTube titled, "Trapped out Smeg x Youngworld – Blood Thicker Than Water"¹⁵ with other Wainwright gang members. **MONROE** is wearing a red shirt and red hat in the video. The rap video depicts the Wainwright gang members glorifying drug distribution and shootings. At one point, the lead rapper states "I'm in beast mode, ducking a RICO."

46. **MONROE** has several firearm-related convictions, including in 2007 for Unlawful Possession of a Firearm (two counts) and in 2003 for Possession of a Firearm, Possession of Ammunition, and Defaced Firearm Violation, for which he was sentenced to two years' imprisonment. **MONROE**'s criminal history also includes convictions for Use Without Authority (2008), Possession to Distribute Class B (Cocaine) (2007), Possession of Class D (Marijuana) and Resisting Arrest (2003), Breaking and Entering with Intent to Commit a Felony, Larceny More, and Possession of Burglarious Tools (also 2003), and Possession of Class D (Marijuana) (2001).

J. ERIC DAVIS, A/K/A "E MONEY BAGS," A/K/A "E ROCK"

47. I believe that **ERIC DAVIS** is a member of the Favre Street Mobb Street Gang. Based on the investigation, I believe that **DAVIS** sold wholesale quantities of drugs to **K. DRAYTON** and **MCGHEE**, and even traveled to California in April 2020 to try and obtain cocaine for subsequent distribution in Boston.

¹⁵ Trapped Out Smeg X Youngworld - Blood Thicker Than Water – YouTube, published August 25, 2017

<https://www.youtube.com/watch?v=r3SdreEJVZk&list=PLQ3YmZ94idvWND4SoTKkJ6OQtpv-D8fu-&index=7>

48. **DAVIS's** criminal history includes a 2007 federal conviction for Possessing a Firearm as a Convicted Felon and Possessing Ammunition as a Convicted Felon, for which he was sentenced to 71 months' imprisonment. He also has a 2013 conviction for Possession of a Firearm Without a Permit (as an armed career criminal) and Possession of a Large Capacity Feeding Device for which he was sentenced to three years' imprisonment and two and a half year's imprisonment, respectively. **DAVIS** also has a 2006 conviction for Assault and Battery and Malicious Destruction of Property, and a 2001 conviction for Perjury and Attempt to Commit a Crime in Suffolk Superior Court, for which he was sentenced to four years' imprisonment. **DAVIS** also has a 2001 conviction for Malicious Destruction of Property and Threats and a 2000 conviction for Possession of Class D (Marijuana).

49. The previously-referenced 2013 conviction for Possession of a Firearm as an armed career criminal related to an incident that occurred shortly after **DAVIS's** release from federal prison from federal prison and while on federal probation. Specifically, law enforcement officers saw **DAVIS** fire shots at a white model sedan on Washington St. near the B-2 Boston Police Station. The car had four male occupants at the time of the shooting, three of whom suffered gunshot wounds and one of whom suffered an eye injury from broken glass. Police immediately pursued **DAVIS**, who fled the area at a high rate of speed, leading police on a high speed chase that ultimately ended with **DAVIS** crashing his motor vehicle into a trash receptacle and a utility pole. **DAVIS** exited his vehicle and fled on foot. During the foot pursuit, the officer saw **DAVIS** toss a firearm on the ground. The officer stopped to secure the firearm and advised other officers of the direction to which **DAVIS** had fled. Officers subsequently apprehended **DAVIS**.

K. DEREK HART

50. I believe **DEREK HART** (“**HART**”) is a member of the Stockton Street Bloods. **HART** distributes large quantities of cocaine and is a drug supplier to **K. DRAYTON**.

51. **HART** has a criminal history that includes several firearm related charges, including convictions for Possession of a Firearm, Possession of Ammunition and Carrying a Firearm with Ammunition out of Suffolk Superior Court. The charge stemmed from an incident in 2009 that involved a victim being shot in the leg outside a Dorchester residence. Witnesses positively identified **HART** as the suspect that was holding the black semi-automatic firearm, recovered under a motor vehicle, near the shooting.

52. **HART**'s criminal history also includes convictions for Possession to Distribute Class D and Possession to Distribute Class B (2 counts) in 2008. In 2017, **HART** was also convicted for Driving While Impaired in Charlotte, North Carolina where he received a 12 month probation sentence.

L. WINSTON MCGHEE, A/K/A “POOH”

53. I believe **WINSTON MCGHEE** (“**MCGHEE**”) is a member of Codman Sq/Millet St. gang and a high level associate of Wainwright Street gang. **MCGHEE** is a large quantity cocaine supplier. **MCGHEE** was arrested during the course of this investigation for his alleged involvement in a shooting.

54. **MCGHEE** is currently on pre-trial release out of Roxbury District Court for firearm offenses for a shooting that occurred on April 17, 2020. **MCGHEE** has an extensive criminal history including a 2007 federal conviction for Possession to Distribute Class B (cocaine base) and Possession Class B (cocaine base) out of the District of Massachusetts. He was sentenced in 2009 to 96 months, in 2011 it was reduced to a 60 month sentence on appeal. **MCGHEE**'s

federal probation supervision was terminated in November 2016. In 2017, **MCGHEE** was convicted in Boston Municipal Court for Possession of Class B, Controlled Substance and Resisting Arrest. In 2014, **MCGHEE** was convicted for Assault and Battery out of Suffolk Superior Court, where he was sentenced to 2 years in prison. In 2007, **MCGHEE** was convicted of Possession of a Firearm without a Permit and Possession of Ammunition in Suffolk County Superior Court, where he was sentenced to two and a half years. In 2002, **MCGHEE** was convicted of Assault and Battery, Dangerous Weapon, and Resisting Arrest where he received a 90 day suspended sentence.

M. KAREEM CHAPLIN

55. **KAREEM CHAPLIN** (“**CHAPLIN**”) is a partner of **MONROE** in the distribution of cocaine. As previously noted, on February 28, 2020 investigators executed a search warrant for **MONROE** and **CHAPLIN**’s shared “stash house” located at 55 Woodhaven Street, Mattapan, Massachusetts. Officers seized six handguns, approximately 417 grams of cocaine, and multiple rounds of ammunition, as well as paperwork in **CHAPLIN**’s name.¹⁶

56. In 2001, **CHAPLIN** was found guilty in Suffolk County Superior Court for Assault with a Dangerous Weapon and Armed Robbery, for which he was sentenced to 4 to 5 years in prison for the latter. In 2000, **CHAPLIN** was convicted in Dorchester District Court for Assault and Battery with a Dangerous Weapon and Assault and Battery, for which he received a sentence of probation.

¹⁶ The search and ensuing calls are discussed at ¶¶ 52-58 of the **K.DRAYTON** Compl. Aff.

N. RUSSELL HANKERSON

57. **RUSSELL HANKERSON** (“**HANKERSON**”) purchased large quantity amounts of cocaine from **MONROE** for redistribution.

58. **HANKERSON** is currently on pre-trial release out of Stoughton District Court for Operating after a Suspended License. In 2014, **HANKERSON** was convicted in Roxbury District Court for Resisting Arrest and Disturbing the Peace. He was also charged with Carrying a Dangerous Weapon, for which he received a continuance without a finding. In 2010, **HANKERSON** was found guilty in Dorchester District Court for Breaking and Entering during the Daytime with the Intent to Commit a Felony, Threatening to do Bodily Harm, and Malicious Destruction of Property, for which he received a sentence of probation. In 2003, **HANKERSON** was convicted of Possession of Class B and Class D, receiving a sentence of probation.

O. TARIK MUHAMMAD

59. I believe **TARIK MUHAMMAD**, (“**MUHAMMAD**”) is a member of the St. Joseph’s street gang. **MUHAMMAD** has a tattoo on his arm of the Saints fleur-de-lis logo, which is a symbol often used by the St. Joseph’s street gang. **MUHAMMAD** has been in contact with **K. DRATYON** to purchase large quantity amounts of cocaine.

60. In addition to the open case for Drug Trafficking, **MUHAMMAD** is on pre-trial release out of Roxbury District Court for Possession of a Loaded Firearm without a License, Ammunition with no FID Card and Resisting Arrest. **MUHAMMAD** has a conviction for Assault and Battery in 2013 where he was sentenced to 1 year in jail.

P. JARMINA KALLON

61. **JARMINA KALLON** (“**KALLON**”) communicated with **K. DRAYTON** to purchase large quantities of cocaine and cocaine base. On April 18, 2020, **KALLON** was arrested

for trafficking cocaine after officers recovered approximately 62 grams of cocaine from **KALLON**'s waist area after a brief foot pursuit.

62. **KALLON** has a criminal history that includes an open 2017 case for Possession of a Firearm without a Permit out of Attleboro District Court.

Q. PHILLIP WILLIAMS

63. **PHILLIP WILLIAMS** ("**P. WILLIAMS**") has been intercepted during this investigation buying ounce quantity amounts of cocaine from **HODGES**, which is consistent with redistribution.

64. In addition to the drug related activities involving **P. WILLIAMS**, according to police reports, he is also responsible for several instances of violence within the Fidelis Way Development. In June 2017, a resident of 2 Fidelis Way called the police to report that they were in fear for their safety as they were constantly being harassed by **P. WILLIAMS** and his friends who hang out in the area of the victim's apartment. The victim asked **P. WILLIAMS** to leave, knowing **P. WILLIAMS** and his friends did not reside there. The group did not respond kindly to the victim's request and since then the victim has continued to be harassed. On the day of the complaint, **WILLIAMS** woke the victim by banging on the victim's bedroom window, screaming and cursing. The victim advised **P. WILLIAMS** the police would be called. At this point **P. WILLIAMS** went to the next window, which happened to be the bathroom window of the victim's apartment, where the victim's husband was. The victim's husband observed **P. WILLIAMS** standing outside the window, screaming, and pointing a black firearm directly at him. **P. WILLIAMS** fled the area upon police arriving to the scene.

65. **P. WILLIAMS**' propensity for violence and his hostile interactions with police has been observed throughout this investigation. In 2018, **P. WILLIAMS** was out on \$15,000 bail in

Brighton District Court for Trafficking Class B substance and Operating a Motor Vehicle After Suspension. Officers were also aware of **P. WILLIAMS** having a suspended license. On May 23, 2018, at approximately 8:30 a.m., officers in the area of Fidelis Way observed **P. WILLIAMS** operating a black BMW 750 sedan. **P. WILLIAMS** was then stopped by police in a marked Boston Police car and placed under arrest for operating a motor vehicle after suspension. Later that morning, around 11:30 a.m., as **P. WILLIAMS** was being escorted from the prisoner bay at District 14 into a marked Boston Police Cruiser, **P. WILLIAMS** spotted Officer Nunez at the gas pumps and looked directly at Officer Nunez and stated “I’m coming to see you specifically, y’all fucked up my car, watch when I get out, I’m coming for you specifically.” Officer Nunez is assigned to the Drug Control Unit and, at the time, was a witness for two pending criminal proceedings against **P. WILLIAMS**. A Boston Police report was filed for witness intimidation and threats to commit bodily harm. Later that day, **P. WILLIAMS** returned to the Boston police department, demanding the names and badge numbers of the officers as he paced back and forth in the front hallway of the station, yelling in the direction of the officer behind the front counter. **P. WILLIAMS** stated “Y’all aren’t the only ones that got guns,” and “I’ll get your badge, then I’ll get your address, I’ll find out how many kids you got.” **P. WILLIAMS** continued pacing in the hallway stating he was going to “sue all y’all and get your pensions” in regards to his most recent arrest, which he complained of “drugs” being “planted on him.”

66. **P. WILLIAMS** has a lengthy criminal history including several convictions for firearm and violent crime offenses in Massachusetts and in Alabama. In 2018, **P. WILLIAMS** was convicted in Brighton District Court of Assault and Battery on a Family Member, Strangulation, Suffocation and Intimidation, after **P. WILLIAMS** attempted to strangle his girlfriend who was five months pregnant at the time. **P. WILLIAMS** was sentenced to a 2 year

suspended sentence. In 2012, **P. WILLIAMS** was convicted for Assault and Battery and Abuse Prevention Act, in West Roxbury District Court, where he was sentenced to 2.5 years. In 2006, **P. WILLIAMS** was convicted in Bristol County Superior Court for Possession of a Controlled Substance with intent to Distribute (class D – Marijuana), Possession of Ammunition, and Possession of a Firearm (with one prior firearm possession charge). **P. WILLIAMS** was sentenced to three years for the firearm charge. In 2004, **P. WILLIAMS** was convicted of 2 counts of Trespassing in Brighton District Court. In 2002, **P. WILLIAMS** was convicted in Suffolk County Superior Court for Carrying a Dangerous Weapon without a License, Possession of a Firearm with No Identification, Assault and Battery with a Dangerous Weapon, Assault with a Dangerous Weapon, and Assault to Rob. **P. WILLIAMS** received a one year sentence for Carrying a Dangerous Weapon and Assault and Battery with a Dangerous Weapon and received a 2.5 year sentence for Assault with a Dangerous Weapon. **P. WILLIAMS** also has a criminal record in Alabama, where he was charged with Possession of a Controlled Substance stemming from an incident in March 2013 and a charge for Kidnapping for an incident that took place in December 2013. On August 8, 2016, the Kidnapping case was dismissed and **P. WILLIAMS** was sentenced to 13 months in jail for the Controlled Substance charge.

R. RENARDO WILLIAMS

67. I believe **RENARDO WILLIAMS** (“**R. WILLIAMS**”) is a member of the Castlegate Street gang. **R. WILLIAMS** was in communication with **K. DRAYTON**. On July 30, 2019, **R. WILLIAMS** was placed under arrest in Boston, Massachusetts, after he purchased approximately 125 grams of cocaine from **K. DRAYTON**. He possessed a firearm during his arrest.

68. Massachusetts Board of Probation Record and Interstate Identification Index reveals that **R. WILLIAMS** uses several aliases to include COREY WYNN, COREY WILLIAMS, BRUCE WILLIAMS, BERNARDO WILLIAMS, and RENARD WILLIAMS. In addition to being on pre-trial release out of Suffolk County Superior Court for firearm offenses, mentioned above, **R. WILLIAMS** has a lengthy criminal record including several convictions for violent crimes. In 1997, **R. WILLIAMS** was convicted in Suffolk County Superior Court for Assault to Kill, Possession of a Firearm, and Assault and Battery with a Dangerous Weapon where he was sentenced to 4 to 5 years in prison. He was also charged with Possession of Ammunition and sentenced to 3 years' probation. In 1996, **R. WILLIAMS** was convicted in Suffolk County Superior Court for Possession of Burglarious Tools and two counts of Assault and Battery, where he was sentenced to 2.5 years in prison. **R. WILLIAMS** was also convicted for Drug Trafficking in Portland, Maine. **R. WILLIAMS** served a 16 year state prison sentence for the Drug Trafficking charge.

S. MICHAEL STOKES

69. I believe **MICHAEL STOKES** ("STOKES") is a member of the Heath Street gang. **STOKES** was in communication with **K. DRAYTON** to purchase cocaine.

70. **STOKES** has a lengthy criminal history that includes several violent crime and drug related charges. In 2013, during a BPD operation using undercover officers to investigate the illegal distribution of narcotics in the Huntington Ave area, officers set up a drug transaction with **STOKES** using an undercover officer to purchase \$300 of MDMA ("Molly"). Upon meeting, **STOKES** at the agreed upon location, officers approached **STOKES's** motor vehicle in unmarked BPD motor vehicles, **STOKES** immediately drove away, leading law enforcement officers on a motor vehicle pursuit. **STOKES** proceeded to strike two officers and several motor vehicles before

coming to a stop and fleeing on foot. Officers eventually located **STOKES**. **STOKES** was charged and convicted for three counts of Leaving the Scene of Property Damage, Operating Negligently, and two counts of Assault and Battery with a Dangerous Weapon. **STOKES** was sentenced in Roxbury District Court and received a 2 year suspended sentence with 1 year committed. In 2011, **STOKES** was convicted in Dorchester District Court for Possession to Distribute Class B, Possession to Distribute Class D (Marijuana), and two counts of Possession to Distribute Class C, for which he received an 18 month sentence. In 2007, **STOKES** was convicted in Suffolk County Superior Court for Possession of a Firearm, Possession of Ammunition, Assault with a Dangerous Weapon, Leaving the Scene of a Person Injured, and Resisting Arrest. **STOKES** received a three year sentence for the Firearm and Ammunition charge and a 3 year term of probation, for Assault with a Dangerous Weapon, Leaving the Scene of Person Injured, and Resisting Arrest charge. **STOKES** ultimately violated his terms of probation and was sentenced to 1 year in jail. In 2007, **STOKES** was convicted in Fall River District Court for giving police officers a false address to hinder police officer duty. In 2005, **STOKES** was convicted in Dorchester District Court for Assault with a Dangerous Weapon and Leaving the Scene of Property Damage. **STOKES** received an 18 month suspended sentence, ultimately serving 6 months after **STOKES** violated his terms of release.

T. ANDRE ECHEVARRIA

71. I believe **ANDRE ECHAVARRIA** (“**ECHAVARRIA**”) is a member of the Mass Ave gang. Investigators believe that **ECHEVARRIA** is in contact with **HART** and with **MCGHEE** to purchase cocaine.

72. **ECHEVARRIA** has a lengthy criminal history in Massachusetts, including three prior firearm convictions as well as a criminal conviction in Virginia. **ECHEVARRIA** is currently

on probation until July 19, 2021. In 2012, **ECHEVARRIA** was convicted in Suffolk County Superior Court for Possession of a Firearm without a License and Carrying a Loaded Firearm with No License. **ECHEVARRIA** received a sentence of 6 to 7 years in prison, followed by a probationary period, which – as referenced above – he is currently on. In 2011, **ECHEVARRIA** was convicted in Roxbury District Court for Assault and Battery and was sentenced to 1 year in jail. In 2010, **ECHEVARRIA** was convicted for Forgery in Northampton County, Virginia. **ECHEVARRIA** was sentenced to 5 years in prison, with 4 year and 6 months suspended. In 2008, **ECHEVARRIA** was convicted in Dorchester District Court for Assault and Battery and was sentenced to 18 months in jail. In 2007, **ECHEVARRIA** was convicted for Possession to Distribute Class B (Crack Cocaine) and Distributing Class B (Crack Cocaine) and was sentenced to 2 years in prison. In 2003, **ECHEVARRIA** was convicted in Suffolk County Superior Court for possession of a firearm without a license and possession of ammunition. **ECHEVARRIA** received a sentence of three years for the firearm offense and two years probation. **ECHEVARRIA** ultimately violated his probation terms and was committed to two years in custody. In 2002, **ECHEVARRIA** was convicted for Possession of Class D (marijuana) and Use Without Authority. In 2001, **ECHEVARRIA** was convicted in Suffolk County Superior Court for Armed Assault, Possession of a Firearm and Possession of Ammunition. **ECHEVARRIA** received a sentence of 2 years in the house of corrections for the firearm offense and received two years probation, for the Armed Assault offense, he ultimately violated the terms of probation and was sentenced to two years in custody.

U. ANTONE JEREMIAH

73. Investigators have identified **ANTONE JEREMIAH (“JEREMIAH”)** as an individual to whom **MCGHEE** supplies quantities of cocaine.

74. **JEREMIAH** is currently on probation until October 22, 2020 out of Taunton District Court for Operating after a Suspended License, Leaving the Scene of Property Damage and Operating Negligently. In 2010, **JEREMIAH** was convicted in Plymouth County Superior Court for Assault and Battery, two counts of Assault and Battery with a Dangerous Weapon, Carjacking, Armed Robbery, and Resisting Arrest. **JEREMIAH** was sentenced to 4 to 5 years in prison on one count of Assault and Battery with a Dangerous Weapon and carjacking. While on probation for a Possession to Distribute Class B (Crack Cocaine) charge in Brockton District Court, **JEREMIAH** was charged with Possession of Class D (Marijuana), also in Brockton District Court.

T. TATIANA MORRISSEY

75. **TATIANA MORRISSEY** (“**MORRISSEY**”) is an associate of **HART** and distributed large quantities of cocaine to **K. DRAYTON** and others on behalf of **HART**. Agents have conducted numerous physical surveillances of **MORRISSEY** delivering cocaine to, and picking up U.S. currency from, **K. DRAYTON**.

U. MICHAEL TOUSSAINT

76. **MICHAEL TOUSSAINT** (“**TOUSSAINT**”) is supplied with cocaine by **MONROE**.

77. **TOUSSAINT** has a lengthy criminal history to include criminal records in Massachusetts as well as Florida. **TOUSSAINT**’s Massachusetts convictions include Possession to Distribute class A (Heroin), Possession to Distribute Class B (Suboxone) and Possession of a Firearm Without a License, out of West Roxbury District Court, in 2016. **TOUSSAINT** received a 6 month sentence for the Firearm Offense.

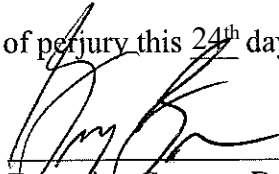
78. **TOUSSAINT**'s criminal record in Florida consists of several criminal charges committed between 2000 and 2009. In 2009, **TOUSSAINT** was convicted for Trespassing Property After a Warning. In 2008, **TOUSSAINT** was found guilty for two counts of Possession of Marijuana. In 2007, **TOUSSAINT** was convicted for Possession of Marijuana and Possession of Cocaine. In 2006, **TOUSSAINT** was found guilty of Battery and sentenced to nine months in jail. In 2004, **TOUSSAINT** was convicted for Grand Theft of a Motor Vehicle, 3rd degree and received probation.

V. DERRICK HOBSON

79. **DERRICK HOBSON** ("**HOBSON**") is a source of supply of cocaine for **COATES**.

80. **HOBSON** has a lengthy criminal history that includes drug and violent crime convictions. In 2005, **HOBSON** was found guilty in Suffolk County Superior Court and sentenced to 7 - 9 years in state prison for Trafficking more than 250 grams of cocaine. In 1998, **HOBSON** was convicted for Fraud and Larceny and received a one year suspended sentence. In 1995, **HOBSON** was found guilty in Suffolk County Superior Court for two counts of Possession of Firearm, Possession of Ammunition, Possession to Distribute Class B, and Assault and Battery. **HOBSON** received a 2 year sentence on the drug and firearm offenses. In 1994, **HOBSON** was convicted for Threats, Possession of Class D, Violation of a Restraining Order and Carrying a Dangerous Weapon. **HOBSON** initially received a suspended sentence on all counts, however **HOBSON** ultimately served time after terms of release were violated. **HOBSON** was convicted in Dorchester District Court for Assault and Battery on a family member in 1994, as well.

Signed under the pains and penalties of perjury this 24th day of June 2020.

A handwritten signature in black ink, appearing to read 'Gregory Brown', is written over a horizontal line.

Detective Gregory Brown
Boston Police Department